

1 BILAL A. ESSAYLI  
2 United States Attorney  
3 DAVID M. HARRIS  
4 Assistant United States Attorney  
5 Chief, Civil Division  
6 JOANNE S. OSINOFF  
7 Assistant United States Attorney  
8 Chief, Complex and Defensive Litigation Section  
9 PAUL (BART) GREEN (Cal. Bar No. 300847)  
10 ALEXANDER L. FARRELL (Cal. Bar No. 335008)  
11 Assistant United States Attorneys  
12 Federal Building, Suite 7516  
13 300 North Los Angeles Street  
14 Los Angeles, California 90012  
15 Telephone: (213) 894-5557 / -0805  
16 Email: Paul.Green@usdoj.gov  
17 Alexander.Farrell@usdoj.gov

18 Attorneys for Defendants

19  
20 UNITED STATES DISTRICT COURT  
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 STUDENT DOE #3,

23 Plaintiff,

24 v.

25 KRISTI NOEM, in her official capacity  
26 as Secretary of Homeland Security; *et*  
27 *al.*,

28 Defendants.

No. 8:25-cv-00706-DOC-DFM

**DECLARATION OF ALEXANDER L.  
FARRELL IN SUPPORT OF  
DEFENDANT'S OPPOSITION TO  
STUDENT DOE #3'S EX PARTE  
APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE RE:  
PRELIMINARY INJUNCTION**

Honorable David O. Carter  
United States District Judge

**DECLARATION OF ALEXANDER L. FARRELL**

I, Alexander L. Farrell, do hereby declare and state as follows:

1. I am an Assistant United States Attorney for the Central District of California and one of the attorneys assigned to represent the United States of America in this action. I make the following factual statements based on my personal knowledge. If called as a witness, I could and would competently testify thereto.

2. I make this declaration in support of Defendants' opposition to Plaintiff's *ex parte* application (Dkt. 17).

3. Attached hereto as **Exhibit 1** is a true and correct copy of a district court order denying a request for a temporary restraining order in the matter titled as, *Deore, et al. v. Sec'y of U.S. Dep't of Homeland Sec., et al.*, 2:25-cv-11038-SJM-DRG, Dkt. 20 (E.D. Mich. Apr. 17, 2025).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 24, 2025, at Los Angeles, California.

*/s/ Alexander L. Farrell*  
ALEXANDER L. FARRELL  
Assistant United States Attorney